

IN THE UNITED STATES COURT OF FEDERAL CLAIMS
BID PROTEST

BEAR MOUNTAININSIDE)	
REALTY LLC,)	
)	
<i>Plaintiff,</i>)	
)	
v.)	No. 23-457
)	
THE UNITED STATES,)	Judge Richard A. Hertling
)	
<i>Defendant.</i>)	

JOINT MOTION TO STAY PROCEEDINGS

Pursuant to Rules 6 and 7 of the Rules of the Court of Federal Claims (RCFC), Plaintiff Bear Mountainside Realty LLC (Plaintiff), and Defendant, the United States (together with Plaintiff, the Parties), jointly and respectfully move the Court to stay the proceedings in this bid protest until the Court resolves Plaintiff's Motion to Supplement the Administrative Record.

Good cause exists to stay the proceedings. On May 25, 2023, Plaintiff filed a Motion to Supplement the Administrative Record with additional documents from the Internal Revenue Service (IRS) and General Services Administration (GSA) and sought to depose IRS and GSA officials. (See ECF No. 23.) The Parties believe that the Court's resolution of Plaintiff's Motion may impact their respective Motions for Judgment on the Administrative Record, the first of which is currently due on June 7, 2023. Accordingly, allowing a stay of proceedings to resolve Plaintiff's Motion serves the interests of judicial efficiency and economy.

For these reasons, we respectfully request that the Court grant this motion to stay the proceedings until Plaintiff's Motion to Supplement the Administrative Record is resolved.

Dated: June 5, 2023

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s/Gordon Griffin

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